

UNITED STATES DISTRICT COURT

Southern

District of

New York

CHROME HEARTS LLC

SUMMONS IN A CIVIL ACTION

V.
GUESS?, INC.; MACY'S INC.; ET.AL.

CASE NUMBER: 07 Civ. 4812 (AKH)

TO: (Name and address of Defendant)

Guess?, Inc. 1444 S Alameda Street, Los Angeles, California 90021;
Macy's Inc. 7 West Seventh Street, Cincinnati, Ohio 45202;
Cipriani Accessories, Inc. 1415 Redfern Avenue, Far Rockaway, New
York, 11691; The Max Leather Group, Inc. 1415 Redfern Avenue, Far
Rockaway, New York, 11691; Jarrod Mark Kahn 408 East 79th Street,
Apartment A, New York, NY 10021.

YOU ARE HEREBY SUMMONED and required to serve on PLAINTIFF'S ATTORNEY (name and address)

TUCKER & LATIFI, LLP
160 East 84th Street
New York, NY 10028
(212) 472-6262

an answer to the complaint which is served on you with this summons, within 20 days after service of this summons on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. Any answer that you serve on the parties to this action must be filed with the Clerk of this Court within a reasonable period of time after service.

J. MICHAEL McMAHON

AUG 22 2007

CLERK

DATE

(By)  DEPUTY CLERK

AO 440 (Rev. 8/01) Summons in a Civil Action

RETURN OF SERVICE		
Service of the Summons and complaint was made by me ⁽¹⁾	DATE	
NAME OF SERVER (<i>PRINT</i>)	TITLE	
<i>Check one box below to indicate appropriate method of service</i>		
<div style="margin-bottom: 10px;"> <input type="checkbox"/> Served personally upon the defendant. Place where served: </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein. Name of person with whom the summons and complaint were left: </div> <div style="margin-bottom: 10px;"> <input type="checkbox"/> Returned unexecuted: </div> <div> <input type="checkbox"/> Other (specify): </div>		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL \$0.00
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on _____ Date _____ <i>Signature of Server</i> _____</p> <p style="text-align: center;">_____ <i>Address of Server</i></p>		

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CHROME HEARTS, LLC.

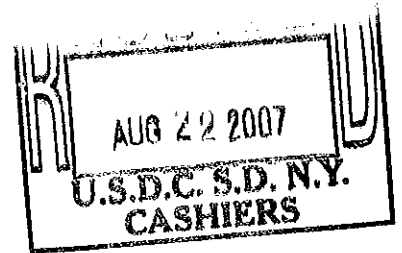
Plaintiff,

v.

GUESS?, INC.; MACY'S INC.; CIPRIANI
ACCESSORIES, INC.; THE MAX LEATHER GROUP, INC.;
And JARROD MARK KAHN, an individual,

Defendants.

Civil Action No.
07 Civ. 4812 (AKH)



FIRST AMENDED COMPLAINT

Plaintiff, **Chrome Hearts LLC**, by its attorneys, as and for its complaint, alleges upon information and belief:

THE PARTIES

1. Plaintiff **Chrome Hearts, LLC**. ("Chrome Hearts" and/or "Plaintiff") is a limited liability company organized and existing under the laws of the State of Delaware, with an office and place of business at 915 N. Mansfield Avenue, Los Angeles, California 90038.

2 (a). Upon information and belief, defendant **Guess?, Inc.** is a California corporation with a principal place of business at 1444 S Alameda Street, Los Angeles, California 90021; is transacting and doing business within this judicial district and has committed the acts complained of herein within this judicial district. **Guess?, Inc.** is subject to the jurisdiction of this Court pursuant to the laws of this State and Rule 4 of the Federal Rules of Civil Procedure.

2 (b). Upon information and belief, defendant **Macy's Inc.** is an entity of unknown origin having an office and place of business at 7 West Seventh Street, Cincinnati, Ohio

45202; is transacting and doing business within this judicial district and has committed the acts complained of herein within this judicial district. **Macy's Inc.** is subject to the jurisdiction of this Court pursuant to the laws of this State and Rule 4 of the Federal Rules of Civil Procedure.

2(c). Upon information and belief, defendant **Cipriani Accessories, Inc.** is an entity of unknown origin having an office and place of business at 1415 Redfern Avenue, Far Rockaway, New York, 11691; is transacting and doing business within this judicial district and has committed the acts complained of herein within this judicial district. **Cipriani Accessories, Inc.**, is subject to the jurisdiction of this Court pursuant to the laws of this State and Rule 4 of the Federal Rules of Civil Procedure.

2(d). Upon information and belief, defendant **The Max Leather Group, Inc.** is an entity of unknown origin having an office and place of business at 1415 Redfern Avenue, Far Rockaway, New York 11691; is transacting and doing business within this judicial district and has committed the acts complained of herein within this judicial district. **The Max Leather Group, Inc.** is subject to the jurisdiction of this Court pursuant to the laws of this State and Rule 4 of the Federal Rules of Civil Procedure.

2(e). Upon information and belief, defendant **Jarrold Mark Kahn** is an individual residing at 408 East 79th Street, Apartment A, New York, NY 10021 and is one of the conscious, dominant and active forces behind the wrongful acts of the corporate defendants Max Leather Group, Inc. and Cipriani Accessories, Inc., which wrongful acts he engaged in for the gain and benefit of defendants Max Leather Group, Inc. and Cipriani Accessories, Inc. and for his own individual gain and benefit. Defendant Jarrold Mark Kahn is subject to the jurisdiction of this court pursuant to laws of this State and Rule 4 of the Federal Rules of Civil Procedure. Defendants Guess?, Inc, Macy's Inc., Cipriani Accessories, Inc., The Max Leather Group, Inc., and Jarrold Mark Kahn are hereinafter collectively referred to as "Defendants".

JURISDICTION

3. The first claim herein arises under the Copyright Laws of the United States, 17 U.S.C. §101 *et seq.*, the second claim herein arises under the Federal Trademark Act of 1946, 15 U.S.C. §1051 *et seq.* and, accordingly, subject matter jurisdiction for these claims is conferred on this Court by virtue of 17 U.S.C. §501 *et seq.* and 15 U.S.C. §1121, as well as 28 U.S.C. §1338 (a).

4. The third claim herein arises under the law of unfair competition and the statutes of the State of New York and is a claim joined with substantial and related claims under the Trademark Laws of the United States and, accordingly, subject matter jurisdiction for the fourth claim is conferred on this Court by virtue of 38 U.S.C. §1338 (b) and the doctrine of pendent jurisdiction.

5. Venue is founded on 28 U.S.C. §1391 (b) and (c) and §1400 (a).

COMMON ALLEGATIONS

6. Chrome Hearts has been designing, manufacturing and selling artistically styled leather goods, apparel, jewelry and accessories since early 1989.

7. The products, and/or their packaging of all Chrome Hearts goods all bear the trademark **CHROME HEARTS**.

8. Chrome Hearts sells a wide variety of quality artistic products, including leather pants, leather jackets, leather vests, various jewelry styles made of sterling silver, gold and platinum, including necklaces, bracelets, rings and wallet chains, belt buckles and a wide collection of other products, including its recent line of custom, one-of-a-kind furniture.

9. Chrome Hearts pioneered the idea of combining the look of rugged motorcycle looking apparel with fashion attire to make high end fashion apparel and accessories. All of Chrome Hearts' leather products are adorned with sterling silver hardware, including all of the

buttons and ornamental pieces. Chrome Hearts further pioneered the look of suede inlay designs used on much of its leather clothing. Once thought of as only a look for outlaw motorcyclists, Chrome Hearts has created a fashion niche that is now coveted in the upper-most fashion circles.

10. Entertainers, such as Cher, Billy Idol, Aerosmith, Lenny Kravitz, Guns N' Roses, Seal, Madonna, Keith Richards, Danny Glover, Sting, Gloria Estefan, Christy Turlington, Naomi Campbell and Sharon Stone can all be seen in Chrome Hearts' fashions. Chrome Hearts products are sold in the exclusive CHROME HEARTS stores throughout the world, such as in New York, Paris, Los Angeles, Malibu, Las Vegas, Honolulu, Hong Kong, Taipei, Tokyo, Osaka, and in select speciality stores, such as Bergdorf Goodman in New York, Browns of London and the United Arrows and Intellectual Galleries boutiques in Japan.

10. In 1993, the Council of Fashion Designers of America ("CFDA") presented plaintiff Chrome Hearts with an unsolicited award as designer of the year for its innovative accessories and jewelry designs.

12. All Chrome Hearts products are hand made in Los Angeles by Chrome Hearts' craftsmen. The level of expert workmanship exercised by these individuals is superior and conforms to the strict standards established by Chrome Hearts.

13. Works designed by Chrome Hearts have been praised and recognized in numerous articles appearing in both trade publications and publications directed to the general public around the world, including articles in the United States, Germany, Japan and France. These articles have acclaimed the high artistry, fashion and style of Chrome Hearts' designs and the uniqueness of the designs.

14. Since 1991, Chrome Hearts' products have generated retail sales of over Three Hundred Fifty Million Dollars (\$350,000,000).

15. Plaintiff Chrome Hearts is the owner of U.S. Trademark Registration No. 1,665,791 for the **CHROME HEARTS** mark in International Classes 14, 18, 25 and 26; U.S.

Trademark Registration No. 2,216,570 for the **CHROME HEARTS plus the Scroll Design** mark in International Class 14; U.S. Trademark Registration No. 2,216,575 for the **CHROME HEARTS plus the Horseshoe Design** mark in International Class 25; U.S. Trademark Registration No. 2,118,026 for the **CHROME HEARTS plus the Scroll Design** mark in International Classes 18 and 25; U.S. Trademark Registration No. 2,214,642 for the **CHROME HEARTS plus the Dagger Design** mark in International Class 18 and U.S. Trademark Registration No. 2,214,641 for the **CHROME HEARTS plus the Dagger Design** mark in International Class 25 (collectively referred to herein as the "Chrome Hearts Mark"). Chrome Hearts is entitled to the exclusive use and benefit of all of its Registrations.

16. The Chrome Hearts Mark has come to identify, in the United States and throughout the world, high quality leather fashions, jewelry and accessories designed and manufactured by Chrome Hearts.

17. Among many other U.S. Copyright Registrations, Chrome Hearts is the owner of U.S. Copyright Registration No. 705-234 for the **Classic Oval Design** belt buckle (hereinafter the "Copyrighted Work"). Annexed hereto and identified as *Exhibit 1* is a copy of the Registration for the Copyrighted Work. Also annexed hereto and identified as *Exhibit 2* is a photograph of the Copyrighted Work.

18. Chrome Hearts has duly complied in all respects with the provisions of Title 17 of the United States Code and has secured the rights and privileges accorded to the Copyrighted Work under the copyright laws of the United States.

Defendant's Infringing Activities

COPYRIGHT INFRINGEMENT UNDER 17 U.S.C. §101 ET SEQ.

19. As the owner of the Copyrighted Work, plaintiff Chrome Hearts is entitled to the exclusive use of this design without the unauthorized use by third parties. Given the

widespread popularity and availability of Chrome Hearts' products, Defendants had access to the work and upon information and belief Defendants have knowingly infringed upon Chrome Hearts' copyrighted belt buckle design by manufacturing, distributing, selling and advertising piratical copies of the buckle at wholesale and at retail through defendant Guess?, Inc.'s on line store at www.guess.com and in GUESS?-named retail stores nationwide and throughout the world in violation of 17 U.S.C. §501. Annexed hereto and identified as *Exhibit 3* is a photograph of Defendants' infringing belt buckle as it appears and is offered for sale on defendant Guess?, Inc.'s website (hereinafter, the "Counterfeit Buckle").

20. Upon information and belief, Defendants have intentionally, knowingly and willfully copied Chrome Hearts' Copyrighted Work to benefit from the widespread customer recognition and acceptance of one of Chrome Hearts' most iconic designs and to capitalize upon the market created by plaintiff Chrome Hearts for its products. Defendants have manufactured, advertised and sold the Counterfeit Buckle to various customers throughout the United States, including within this judicial district, and throughout the world.

21. Upon information and belief, defendant Macy's Inc. placed a prominent pre Father's Day advertisement in the New York Times advertising the Counterfeit Buckle for sale in various select Macy's retail stores. A copy of Macy's advertisement of the Counterfeit Buckle is annexed hereto as *Exhibit 4*.

22. Upon information and belief, the aforesaid infringement by Defendants of plaintiff Chrome Hearts' Copyrighted Work was and continues to be with the knowledge that such design is copyrighted and the Defendants, in doing the acts complained of herein, have willfully infringed upon Chrome Hearts' rights under the Copyright Laws of the United States, Title 17 U.S.C. §101, et seq.

23. Defendants' Counterfeit Buckle is almost identical to plaintiff Chrome Hearts' genuine Copyrighted Work. There can be no doubt that Chrome Hearts' copyrighted design was

employed to manufacture the molds used to make Defendants' piratical copy.

24. Defendants' infringement of plaintiff Chrome Hearts' Copyrighted Work is to the great and irreparable damage of plaintiff, and plaintiff Chrome Hearts is informed and believes, as indicated, that Defendants will continue such infringing acts unless enjoined by this Court.

25. Plaintiff has no adequate remedy at law and has suffered irreparable damage as a result of Defendants' acts as aforesaid in an amount thus far not determined, but believed to be in excess of Seven Hundred Thousand Dollars (\$700,000).

FEDERAL UNFAIR COMPETITION

26. Plaintiff Chrome Hearts repeats and realleges every allegation contained paragraphs 1 through 21, 23 and 24 as though fully set forth herein.

27. This claim arises under the provision of the Trademark Act of 1946, 15 U.S.C. 1051, et seq., particularly under 15 U.S.C. 1125(a) and alleges the use in commerce of a false designation of origin and false or misleading description of fact and false or misleading representation of fact.

28. By reason of the marketing, celebrity status and unsolicited press coverage generated for Chrome Hearts' products at the trade and consumer levels, and the unique quality of the products comprising the entire line of plaintiff's, these products are recognized by the trade and consumers as being products designed and hand crafted by plaintiff Chrome Hearts.

29. Chrome Hearts' products have become widely known among purchasers as articles that are designed and manufactured by plaintiff. These products are known to be quality items, with unique designs, made of the highest quality materials, and embodying expert craftsmanship.

30. The goodwill of the plaintiff Chrome Hearts and the favorable reputation residing in Chrome Hearts' products is a valuable asset belonging to plaintiff.

31. Defendants, with knowledge of the widespread recognition of Chrome Hearts' products among the relevant segment of the market and with the specific intent to exploit that recognition, have undertaken to make, advertise and sell the Counterfeit Buckle. It is Defendants' intention to have the ultimate purchasers of their Counterfeit Buckles believe that they are products that emanate from plaintiff Chrome Hearts.

32. By reason of Defendants' sale of the Counterfeit Buckles, the public has been and is being misled as to the nature and quality of goods being sold by Defendants, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1051.

33. By reason of the foregoing, Defendants have used in commerce, on or in connection with the goods and/or services, a false designation of origin, a false or misleading description of fact or false or misleading representation of fact, including words, terms, names, devices and symbols or a combination thereof which is likely to cause confusion, or mistake, or to deceive as to the affiliation, connection, or association of such Defendants with plaintiff Chrome Hearts or as to the origin, sponsorship, or approval of Defendants' products, services or commercial activities by plaintiff with full knowledge of the falsity of such designations of origin or such descriptions or representations, all to the detriment of plaintiff Chrome Hearts.

34. Plaintiff Chrome Hearts has no adequate remedy at law and has suffered irreparable damage as a result of Defendants' acts as aforesaid in an amount thus far not determined, but believed to be in excess of Seven Hundred Thousand Dollars (\$700,000).

COMMON LAW UNFAIR COMPETITION

35. As a complete and third ground for relief, plaintiff Chrome Hearts hereby charges Defendants with common law unfair competition under the laws of the State of New York, and hereby realleges and reasserts all of the allegations contained in paragraphs 1 through 21, 23, 24, 28 through 31 and 33 hereof as though fully set forth herein.

36. Defendants' manufacturing, distribution advertising and sale of the Counterfeit Buckle incorporating the distinctive designs of plaintiff Chrome Hearts' products is likely to cause confusion between such products and the goods sold by plaintiff Chrome Hearts, thus constituting an infringement of plaintiff's valuable common law rights.

37. Upon information and belief, Defendants are "palming off" their infringing products as the high quality merchandise of plaintiff Chrome Hearts, and are knowingly enabling others to do the same and are thus deliberately and knowingly misappropriating and diverting plaintiff's valuable proprietary rights and goodwill, and the reputation symbolized thereby, thereby unfairly competing with plaintiff.

38. Upon information and belief, Defendants' unfair competition has caused and, if allowed to continue, will continue to cause sales of plaintiff's products to be lost and/or diverted to Defendant. Further, Defendants' unfair competition has caused substantial and irreparable damage and injury to plaintiff and in particular to its valuable goodwill and reputation, and unless enjoined by this Court, will continue to cause substantial and irreparable damage and injury to plaintiff.

39. Plaintiff has no adequate remedy at law and has suffered irreparable damage as a result of Defendants' acts as aforesaid in an amount thus far not determined, but believed to be in excess of Seven Hundred Thousand Dollars (\$700,000).

WHEREFORE, plaintiff demands:

A. that Defendants, its officers, agents, employees, attorneys and all persons acting in concert, participation or combination with Defendants, be preliminarily and permanently enjoined from infringing upon plaintiff's Copyrighted Work or any copyrighted design owned by plaintiff and from manufacturing, promoting, advertising and selling any product substantially similar to the copyrighted work of plaintiff, or any work substantially

similar to the proprietary designs of plaintiff;

B. that Defendants, its officers, agents, employees, attorneys and all persons acting in concert, participation or combination with Defendants, be preliminary and permanently enjoined from competing unfairly with plaintiff, from falsely representing and falsely designating the origin of Defendants' goods, from diluting the distinctive quality of plaintiff's trademark and from engaging in false advertising;

C. that Defendants be required to pay to plaintiff Chrome Hearts damages in a sum to be determined at trial and to account for all gains, profits and advantages derived by Defendants by the sale or advertisement of the Copyrighted Work or any work confusingly similar thereto; represented or advertised by Defendants to be a genuine Chrome Hearts product or its equivalent;

D. that the Counterfeit Buckles be recalled from all of Defendants' stores and customers and surrendered to plaintiff Chrome Hearts for destruction;

E. that plaintiff be awarded statutory damages by reason of the infringement of plaintiff's Copyrighted Work;

F. that plaintiff be awarded treble damages, punitive damages, reasonable attorneys fees and the costs and disbursements of this action;

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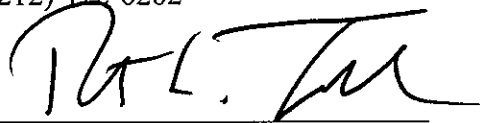
G. that plaintiff be granted an award of punitive damages in view of the willful and malicious nature of Defendants' tortious acts; and,

H. that plaintiff have such other and further relief as the Court deems just and equitable.

Dated: New York, New York
August 21, 2007

Respectfully submitted,

TUCKER & LATIFI, LLP
Attorneys for Plaintiff
160 East 84th Street
New York, NY 10028
(212) 472-6262

A handwritten signature in black ink, appearing to read "R.L. Tucker", written over a horizontal line.

Robert L. Tucker (RLT 1027)

Of counsel:
Brent H. Blakely, Esq.
915 N. Citrus Avenue
Hollywood, California 90038
323-464-7400

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YesFOR
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USE
ONLY

DO NOT WRITE ABOVE THIS LINE. IF YOU NEED MORE SPACE, USE A SEPARATE CONTINUATION SHEET.

PREVIOUS REGISTRATION Has registration for this work, or for an earlier version of this work, already been made in the Copyright Office?

☐ Yes ☒ No If your answer is "Yes," why is another registration being sought? (Check appropriate box) ▼a. ☐ This is the first published edition of a work previously registered in unpublished form.b. ☐ This is the first application submitted by this author as copyright claimant.c. ☐ This is a changed version of the work, as shown by space 6 on this application.

If your answer is "Yes," give: Previous Registration Number ▼

Year of Registration ▼

DERIVATIVE WORK OR COMPILATION Complete both space 6a and 6b for a derivative work; complete only 6b for a compilation.

a. Preexisting Material Identify any preexisting work or works that this work is based on or incorporates. ▼

b. Material Added to This Work Give a brief, general statement of the material that has been added to this work and in which copyright is claimed. ▼

DEPOSIT ACCOUNT If the registration fee is to be charged to a Deposit Account established in the Copyright Office, give name and number of Account.

Name ▼ ROBBINS, BERLINER & CARSON

Account Number ▼ DA 026964

CORRESPONDENCE Give name and address to which correspondence about this application should be sent. Name/Address/Apt./City/State/ZIP ▼

John P. Spitals

c/o ROBBINS, BERLINER & CARSON

201 N. Figueroa Street, 5th Floor

Los Angeles, California 90012-2628

Area Code and Telephone Number ▶ (213) 977-1001

CERTIFICATION* I, the undersigned, hereby certify that I am the

Check only one ▼

☐ author☐ other copyright claimant☐ owner of exclusive right(s)☒ authorized agent of CHROME HEARTS, INC.

Name of author or other copyright claimant, or owner of exclusive right(s) ▲

of the work identified in this application and that the statements made by me in this application are correct to the best of my knowledge.

Typed or printed name and date ▼ If this application gives a date of publication in space 3, do not sign and submit it before that date.

John P. Spitals

date ▶ March 24, 1995

Handwritten signature (X) ▼

MAIL
CERTIFI-
CATE TO

Name ▼

John P. Spitals, c/o

ROBBINS, BERLINER &
CARSON

Number/Street/Apartment Number ▼

201 N. Figueroa Street, 5th Floor

City/State/ZIP ▼

Los Angeles, California 90012-2628

Certificate
will be
mailed in
window
envelope

YOU MUST:

- Complete all necessary spaces
- Sign your application in space 8

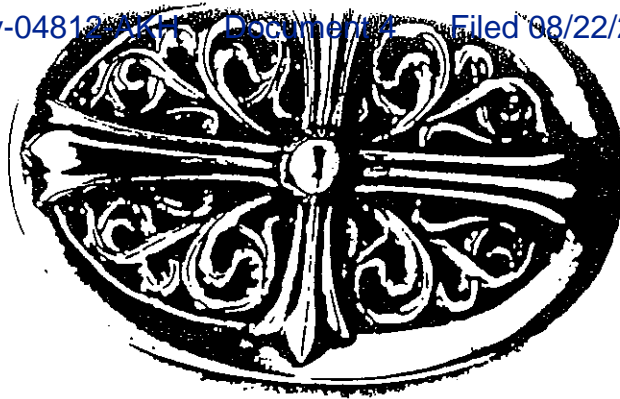
SEND ALL 3 ELEMENTS
IN THE SAME PACKAGE:

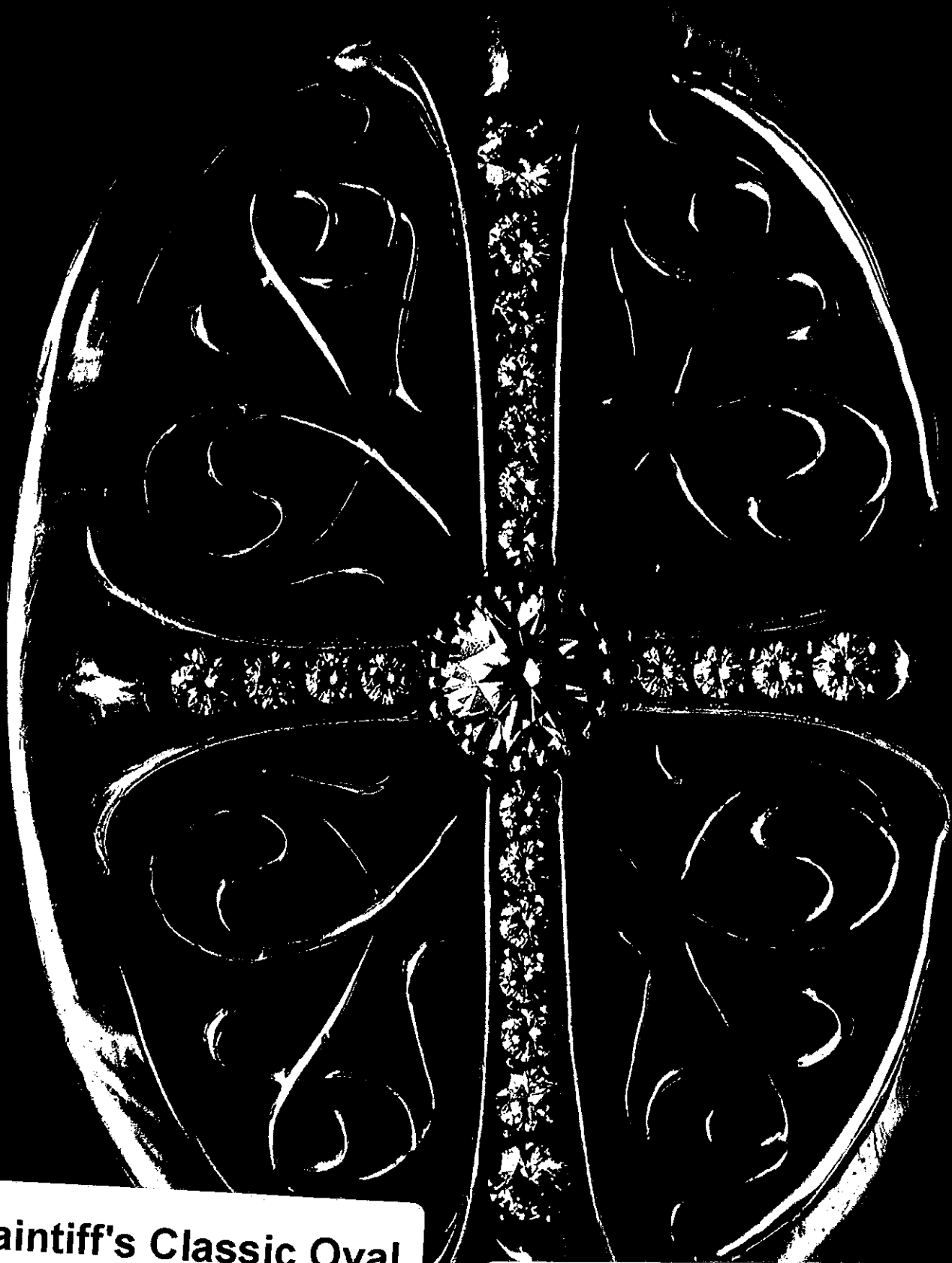
1. Application form
2. Nonrefundable \$20 filing fee in check or money order payable to Register of Copyrights
3. Deposit material

MAIL TO:

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Library of Congress
Washington, D.C. 20559

The Copyright Office has the authority to adjust fees at 5-year intervals, based on changes in the Consumer Price Index. The next adjustment is due in 1996. Please contact the Copyright Office after July 1995 to determine the actual fee schedule.

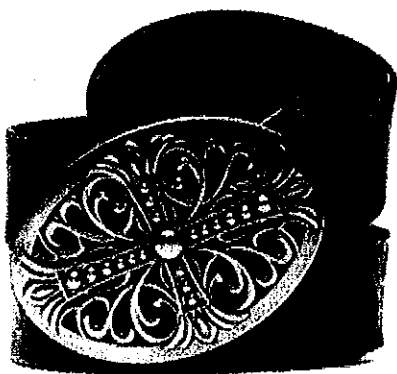




**Plaintiff's Classic Oval
Belt Buckle**

Exhibit 2

GUESS

[Join Our Email](#) | [My Wish List](#) | [My Account](#) | [Shopping Bag](#) 0[WOMEN](#) | [MEN](#) | [ACCESSORIES](#) | [SHOES](#)[SEARCH](#)**Gothic Cross Belt**

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- Domestic and/or imported

35914

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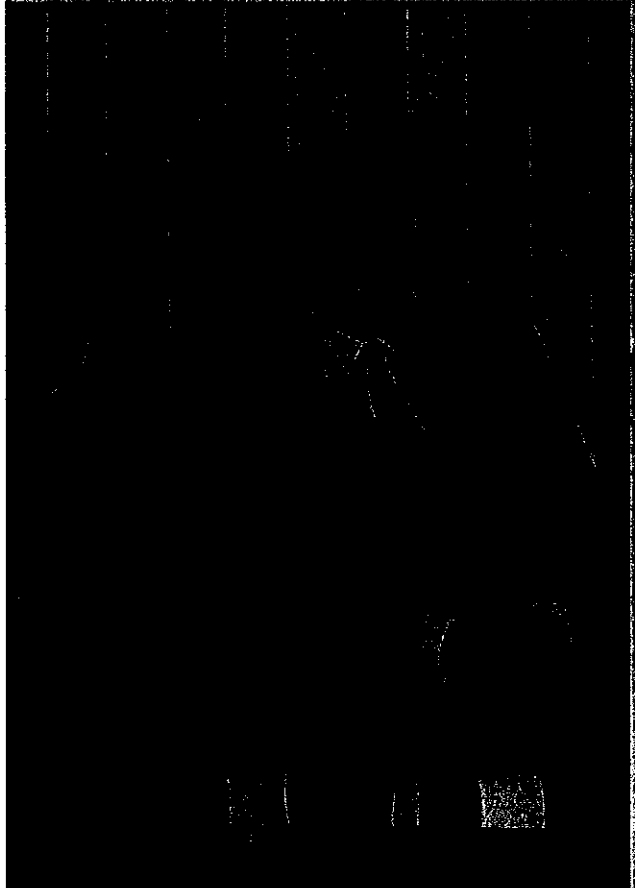
**Defendant's Infringing
Belt Buckle**

Exhibit 3

more than I expect. Then last week, Germany received a crucial endorsement of its plan from Japan's prime minister, Shinzo Abe, who is scheduled to take over the rotating presidency of the Group of 8 next January.

But the German official said, "It was about winning over Bush to get on board and support the U.N. process on climate change." Mrs. Merkel telephoned Mr. Bush in recent weeks, and met him for lunch on

Joint Missile Shield



by President Vladimir V. Putin of Russia and the president of the Group of 8, Chancellor Gerhard Schröder of Germany.

The only photo conference on global security. Avar officials were in communion with the United States and are data from early '05 is not entirely kicked around in the media, recently, and the proposal (has we have heard be- utin presented it in a d and specific way.

ected
aces

American official- tously to the offer weeks of trying to- language coming out they said they viewe the right direction. "I think it's really

Celebrate Father's Day

all about the

STARBUSTS

all about the

STARBUSTS

Exhibit 4